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CHRISTINA LABAJO AND MARY YOON, on behalf of themselves and all others similarly situated

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CHRISTINA LABAJO and MARY YOON, on behalf of themselves and all others similarly situated, Plaintiffs,	Case No. 5:17-cv-00412-AB-DTB **STIPULATION EXTENDING TIME TO RESPOND TO INITIAL COMPLAINT, SETTING BRIEFING SCHEDULE AND**

vs.

VALEANT PHARMACEUTICALS INTERNATIONAL, INC. AND VALEANT PHARMACEUTICALS NORTH AMERICA, LLC,

Defendants.

VACATING DEADLINE TO FILE MOTION FOR CLASS CERTIFICATION

[L.R. 8-3 and 23-3]

Complaint served: March 15, 2017
Current response date: April 5, 2017
New response date: April 26, 2017

Plaintiffs Christina Labajo and Mary Yoon, and Defendants Valeant Pharmaceuticals International, Inc. and Valeant Pharmaceuticals North America, LLC, stipulate and agree as follows:

WHEREAS, Plaintiffs served their Complaint on March 15, 2017, and Defendants' response to Plaintiffs' Complaint is currently due on April 5, 2017;

WHEREAS, pursuant to L.R. 8-3, the parties have agreed to extend Defendants' time to respond to the Complaint to April 26, 2017;

WHEREAS, Defendants intend to file a motion to dismiss for lack of subject-matter jurisdiction, which they contend will dispose of this matter in its entirety;

WHEREAS, to accommodate counsels' schedules and ensure adequate time for briefing on Defendants' anticipated motion, the parties have agreed to a briefing schedule on the anticipated motion;

WHEREAS, pursuant to L.R. 23-3, Plaintiffs' deadline to file their motion for class certification is June 12, 2017;

WHEREAS, to date, the Court has not yet issued an order setting a Case Management Conference date, but the parties intend to set forth a proposed deadline and briefing schedule on Plaintiffs' motion for class certification in their Rule 26(f) Report.

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:

1. Defendants shall file their motion to dismiss on or before April 26, 2017;
2. Plaintiffs shall file their opposition to the motion to dismiss on or before May 22, 2017; and
3. Defendants shall file their reply on or before June 5, 2017.
4. The hearing on the motion will be on Monday, June 19, 2017, at 10:00 a.m., or as soon thereafter as the Court may allow;
5. The parties shall meet and confer and propose a deadline and briefing schedule, subject to the Court's approval, for Plaintiffs' anticipated motion for class certification in their Rule 26(f) Report.

IT IS SO STIPULATED.

Dated: March 31, 2017

FARELLA BRAUN + MARTEL LLP

By: */s/ Thomas Mayhew*
Thomas Mayhew

Attorneys for Defendants
VALEANT PHARMACEUTICALS INTERNATIONAL, INC. and VALEANT PHARMACEUTICALS NORTH AMERICA, LLC

Dated: March 31, 2017

BURSOR & FISHER, P.A.

By: */s/ Joel Smith*
Joel D. Smith

Attorneys for Plaintiffs
CHRISTINA LABAJO and MARY YOON

Signature Attestation

Pursuant to Civil Local Rule 5-4.3.4(i), I hereby attest that all other signatories listed, whose signatures are indicated by a conformed signature ("/s/"), and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 31, 2017

FARELLA BRAUN + MARTEL LLP

By: */s/ Thomas Mayhew*
Thomas Mayhew

Attorneys for Defendants
VALEANT PHARMACEUTICALS INTERNATIONAL, INC. and
VALEANT PHARMACEUTICALS NORTH AMERICA, LLC